

Remarks

I. General Remarks

Applicants respectfully request that the above amendments be entered and further request reconsideration of the application in view of the following remarks. Applicants thank the Examiner for his careful consideration of the claims.

II. Disposition of Claims

Claims 1-20 were pending prior to the Office Action and were rejected. Claims 1-20 are rejected. In this response, claims 1 and 13 are amended, and claim 20 is cancelled.

III. Rejections of Claims

The Examiner has rejected claims 1-14 and 16-20 under 35 U.S.C. 103(a) as being unpatentable over Lafleur (US 7,123,248) in view of Trottier, et al. (US 6,903,706). Additionally, the Examiner has rejected claim 15 under 35 U.S.C. 103(a) as being unpatentable over Lafleur in view of Trottier, et al. and further in view of Reichle (US 2005/0118880).

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). The combination of Lafleur and Trottier fails to teach or suggest the element of a dongle comprising routing circuitry, as required by independent claims 1, 8, and 13, as amended.

Figure 3 of the Specification of the present invention illustrates an embodiment in which a dongle 302 is coupled to single display device connector 208 through communications

link 304. (Published Spec., [0023]) “Dongle 302 includes circuitry to route signals from the video display controller 206 to the appropriate display device.” (Spec., [0023]) In certain embodiments, a cable is connected between the single display device connector 208 and the dongle 302, and cables connect the dongle to each of the display devices. (Spec., [0024]) In other embodiments, single display device connectors 310, 312, and 314 are utilized. (Spec., [0020])

In contrast to the present invention, the combination of Lafleur and Trottier fails to teach or suggest the element of a dongle comprising routing circuitry, as required by independent claims 1, 8, and 13. The Examiner points to Lafleur as disclosing a dongle in Figure 3, element 18 and in column 3, lines 48-49. (Office Action, p.5) Element 18 of Figure 3 of Lafleur is, at best, disclosed to be a cable. (Lafleur, column 3, line 49) Additionally, the Examiner points to Figure 3, elements 4, 6, and 16a, and 16b as disclosing routing circuitry (**separate** from the cable, element 18), stating that arrows show the routing of channels to appropriate display devices. (Office Action, p.6) However, elements 4, 6, 16a, and 16b are, respectively, a video processor, an interface (or multi-channel coupler), and display devices, none of which are equivalent to routing circuitry. The Examiner has stated that element 4 is equivalent to a graphics processing unit, element 6 is equivalent to a display device connector, and elements 16a and 16b are equivalent to display devices. (Office Action, p.3-4) In the present invention, none of the graphics processing unit, display device connector, or display devices are equivalent to a dongle, and as such, even if elements 4, 6, 16a, and 16b were equivalent to the stated elements, which Applicants do not concede, none of these elements is not shown to teach or suggest a dongle comprising routing circuitry. Additionally, the arrows of Lafleur do not in any way teach or suggest routing circuitry; at best they disclose communication links or signals.

(Lafleur, column 3, lines 50-55) These signals are not equivalent to routing circuitry. Thus, Lafleur fails to teach or suggest a dongle comprising routing circuitry, as required by the claims. The Examiner has not pointed to Trottier as teaching or suggesting this element. Therefore, a *prima facie* case of obviousness with respect to the independent claims has not been made with the combination of Lafleur and Trottier. Additionally, as the independent claims are not obvious over this combination, the dependent claims are not, as well.

Conclusion

In light of the above remarks and amendments, Applicants respectfully request reconsideration and withdrawal of the outstanding rejections. Applicants further submit that the application is now in condition for allowance, and earnestly solicit timely notice of the same. Should the Examiner have any questions, comments, or suggestions in furtherance of the prosecution of this application, the Examiner is invited to contact the attorney of record by telephone, facsimile, or electronic mail.

Respectfully submitted,

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